

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

JETBLUE AIRWAYS CORP., ET AL.,

Defendants.

Civil Action No. 1:23-cv-10511-WGY

**AIRBUS AMERICAS, INC’S MOTION FOR LEAVE TO INTERVENE FOR A
LIMITED PURPOSE**

Pursuant to Fed. R. Civ. P. 24 and Local Rule 7.1, Airbus Americas, Inc. (“Airbus”) respectfully moves for leave to intervene as of right under Rule 24(a)(2), or, alternatively, under Rule 24(b) in the above-captioned matters, for the limited purpose of protecting Airbus’s interest in the confidentiality of documents produced or that may be produced in the remaining discovery period, including for the purpose of filing objections pursuant to paragraph 25 of the [Proposed] Stipulated Joint Protective Order and Order Governing Production of Investigation Materials. *See United States et al. v. JetBlue Airways Corp., et al.*, No. 23-cv-10511 (WGY) (“the Government Action”), Dkt # 97 & 97-1 (“the Proposed Order”).

The basis for this Motion is set forth in an accompanying Memorandum in Support of Non-Party Airbus Americas, Inc.’s Motion to Intervene for a Limited Purpose. Airbus respectfully requests that the Court permit Airbus to intervene in this matter for the limited purpose of protecting the confidentiality of its documents, including those that may be produced.

Dated: June 7, 2023

Respectfully submitted,

By: /s/ Scott Peachman

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I HEREBY CERTIFY that in accordance with Local Rule 7.1, counsel for Airbus met and conferred with counsel for the United States and Defendants in the Government Action regarding this motion. Attempts to reach Plaintiffs' counsel in the Private Action (*Garavanian et al. v. JetBlue Airways Corp. et al.*, 1:23-cv-10678) by phone and email were unsuccessful.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic filing.

Dated: June 7, 2023

Respectfully submitted,

By: /s/ Scott Peachman
Scott Peachman